

### **REMARKS**

The Applicant wishes to acknowledge the detail and thoroughness of the Office Action mailed February 15, 2005. This amendment is submitted in response thereto.

With this amendment, claims 1-21 are pending with this application. These claims are respectfully submitted for allowance in light of the above amendments and the following remarks. Claims 1-21 stand rejected under 35 U.S.C. §102(b) as being anticipated by Virgil et al.

#### **Remarks Directed to Rejection of Claims 1-21 Under 35 U.S.C. §102(b) Over Virgil et al.**

The Examiner identifies Virgil et al. as disclosing a computer aided design system with the WAN connected to a control file or neutral database. In order to access data from the control file, it is necessary that the data is addressable. In explaining Figure 3, Virgil states on lines 63-65 of column 9 that "[t]he VM operating system is well known, and is in widespread use as a platform for CAD systems." Figure 4b depicts the platform, which is connected to Figure 4a demonstrating that data is capable of being conveyed from the files in Figure 4a to the platform 4b.

For Virgil et al. to anticipate the present invention as a patent under 35 U.S.C. §102(b), it is required that all claim elements appear in a single prior art device, process or document. Virgil is submitted to teach a method for storing engineering drawings and artwork in a logistical relational database and the step of "transforming" drawings and artwork from a CAD format to directed CALS format. Nowhere in Virgil does it teach of a universal CAD system that employs a CAD-neutral database to achieve independence from translators.

In contrast to the present invention, steps 56 and 58 in Figure 1 of Virgil disclose the need to transform artwork from CAD files to CALS-format files (and vice versa) using a translator like an IGES translator. Virgil relies on translation processes like IGES and CGM to

enable sharing of CAD files, artwork and drawings created from disparate CAD systems for use within a specific database like the LSAR. The CAD-neutral database of the present invention would eliminate the need for these translators and translation processes.

For Virgil to anticipate the present invention as a printed publication under 35 U.S.C. §102(b), it is required to convey sufficient information that one of ordinary skill in the art has possession of the invention either through the written description or other enabling disclosure. Because Virgil requires the use of translators as a necessary means to achieving its objectives, this reference is submitted to actually teach away from the present invention.

Claims 1-21 disclose a computer-aided design system that eliminates the wastes associated with duplication of drafting in multiple CAD formats as well as those associated with comparative errors that result from the transformation processes between the different CAD format renderings using a CAD-neutral database.


Rather than anticipated by Virgil, the present invention is in fact directed to solving the residual problems of prior-art solutions such as that disclosed by Virgil. Because there are numerous CAD systems with many disparate and often incompatible file formats and database engines, there is a booming business directed at creating translators. The present invention provides a seamless and much more efficient sharing of information between disparate CAD systems by providing universal CAD system with a CAD-neutral database that does not require the use of translators to facilitate sharing of files, artwork and drawings created from these disparate CAD systems.

In light of the above remarks, reconsideration and withdrawal of the rejection of claims 1-21 under 35 U.S.C. §102(b) is respectfully requested.

**Summary**

Claims 1-21 are the claims pending in this application. Each claim is believed to be in proper form and directed to allowable and patentable subject matter. Reconsideration and allowance of the claims is solicited. Should the Examiner find to the contrary, or have suggestions as to how the format of the pending claims might be improved, he is requested to contact the undersigned attorney to resolve any remaining issues.

Respectfully submitted,



Avery N. Goldstein  
Registration No. 39,204  
Gifford, Krass, Groh, Sprinkle,  
Anderson & Citkowski, P.C.  
2701 Troy Center Drive, Suite 330  
P.O. Box 7021  
Troy, MI 48007-7021  
(248) 647-6000

Attorney for Applicant


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Janice R. Kuehn